

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	MISCELLANEOUS BUSINESS
WILLIAM J. MURRAY,)	DOCKET NO. 04-MBD-10069
)	
Plaintiff,)	(Related to Cause
)	No. 3:03 CV-088P, U.S. District
v.)	Court, Northern District of Texas,
)	Dallas Division)
TXU CORP., et al.)	
)	
Defendants.)	
)	Civil Action No.

DEFENDANTS' REVISED MOTION
FOR LEAVE TO FILE A REPLY MEMORANDUM

Defendants TXU Corp., TXU Energy Company LLC, and TXU Portfolio Management Company LP, f/k/a TXU Energy Trading Company LP (collectively, “Defendants”) respectfully request leave to file the Reply Memorandum in support of Defendants’ Motion to Compel, and the Supplemental Affidavit of Patricia S. Gill (attached thereto as Exhibit “A”) previously filed on March 26, 2004. This Reply is necessary to address certain new arguments and new affirmative requests for relief, set forth in Non-Party American National Power, Inc.’s (“ANP”) Opposition to TXU’s Motion to Compel and Cross-Motion for Protective Order and Costs, that was filed on March 22, 2004. The Court’s consideration of this Reply will neither delay these proceedings nor unfairly prejudice American National Power, Inc.

ANP's counsel originally assented to Defendants' Motion for Leave to File a Reply Memorandum on March 24, 2004, but has since withdrawn that assent because Defendants would not assent to the filing of a sur-reply, which has prompted the filing of this revised motion (ANP's counsel currently disputes that such assent was ever given on March 24th and now

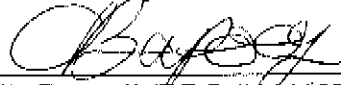
indicates that any such assent was conditional on receiving Defendants' assent for ANP to file a sur-reply).

Dated: March 31, 2004

Respectfully submitted,

**TXU CORP., TXU ENERGY COMPANY
L.L.C, AND TXU PORTFOLIO
MANAGEMENT COMPANY L.P, F/K/A
TXU ENERGY TRADING COMPANY LP**

By Their Attorneys



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Counsel for Defendants

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Anita Bapooji, counsel for Defendants, do hereby certify that I conferred in good faith with Christopher H. M. Carter, counsel for American National Power, Inc. on March 31, 2004, but have been unable to narrow or resolve the issues presented by this motion.



Anita B. Bapooji

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for American National Power, Inc. by facsimile and first class mail, and upon the attorney of record for each other party by certified mail, on March 31, 2004.



Anita B. Bapooji